



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

NEM/DEL/GP  
F. #2020R00580

*271 Cadman Plaza East  
Brooklyn, New York 11201*

September 13, 2023

The Honorable Carol B. Amon  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Yu et al.  
Criminal Docket No. 22-208 (CBA)

Dear Judge Amon:

Each of the defendants in this case has moved to suppress evidence obtained pursuant to six search warrants (the "Challenged Warrants"). On August 29, 2023 and September 5, 2023, the Court ordered the government to advise the Court and defense counsel of the evidence obtained from the Challenged Warrants that the government seeks to introduce at trial. The government previously provided the Court with a list of such evidence on August 31 (ECF Dkt. No. 194) and September 5 (ECF Dkt. No. 202). The government respectfully submits this letter to provide the Court with an update about the evidence it seeks to introduce at trial. In effort to streamline the evidence and narrow the issues in advance of trial, the

government no longer seeks to introduce cell-site location evidence for a phone number associated with Zhe Zhang (ending in -9054) which was obtained as a result of the May 3, 2021 Cell-Site Warrant, as reflected in Government Exhibits 600 and 1401.<sup>1</sup> Accordingly, Zhang's motion to suppress the fruits of the May 3, 2021 Zhang Cell-Site Warrant is moot.

Respectfully submitted,

BREON PEACE  
United States Attorney

By: /s/  
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cc: Clerk of Court (CBA)  
Defense Counsel (By Email and ECF)

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<sup>1</sup> The government still intends to use other information contained in Government Exhibits 600 and 1401, which will contain cell-site location data and a summary of cell site location information for other two phone numbers that do not belong to Zhang and thus, are not affected by Zhang's suppression motion.